

1 Stephen R. Cochell  
Admitted Pro Hac Vice  
2 *srcochell@gmail.com*  
5850 San Felipe, Ste. 500  
3 Houston Texas 77057  
Telephone: (713) 436-8000  
4 Facsimile: (213) 623-2000

5 Allan Grant (SBN#213658)  
Grant's Law Firm  
6 17351 Greentree Drive  
Riverside, California 92503-6762  
7 Telephone (888)937-7555  
Facsimile (866)858-6637

8 Attorneys for Defendant  
9 JASON EDWARD THOMAS CARDIFF

10  
11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 JASON EDWARD THOMAS  
CARDIFF,

17 Defendant.

Case No. 5:23-CR-00021-JGB

**NOTICE OF SUPPLEMENTAL  
AUTHORITY REGARDING  
GOVERNMENT'S MOTION TO  
FORFEIT BAIL AND FOR  
SUMMARY ADJUDICATION AND  
CORRECTION OF RECORD**

19 **NOTICE OF SUPPLEMENTAL AUTHORITY**

20 PLEASE TAKE NOTICE that counsel for Jason Cardiff and the Sureties,  
21 Brian Kennedy and Lila Murphy invite the Court's attention to: *Raich v. Gonzales*,  
22 500 F. Supp. 2d 1102, 1110 (9<sup>th</sup> Cir. 2007). This is relevant to the medical necessity  
23 defense raised by Defendant.

24 With respect to Defendant's Motion to Forfeit Bail and for Summary  
25 Adjudication, on behalf of Ms. Murphy, Government counsel falsely and inaccurately  
26 portrayed asserting that between Ms. Murphy and Mr. Kennedy, only two requests  
27 were made to Defendant by the sureties to return to Houston. Dkt. 204 at 4. In fact,  
28

1 Ms. Murphy asked Mr. Cardiff if he was returning to Houston, as first set out in  
2 Paragraph 17 and later in Paragraph 20, stating that although Mr. Cardiff had medical  
3 problems, he was putting her home at risk and that he needed to return to Houston to  
4 cure that problem. Dkt. 199-1¶ 20.

5 Dated: February 24, 2025.

6 /s/ Stephen R. Cochell  
7 Stephen R. Cochell  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SERVICE LIST**

I HEREBY DECLARE THAT THE FOLLOWING COUNSEL  
HAVE BEEN SERVED WITH THIS DEFENDANT JASON  
CARDIFF'S NOTICE OF MOTIO AND MOTION TO SUPPRESS  
EVIDENCE THROUGH THE COURT'S ECF O NEXT GEN  
ELECTRONIC FILING SYSTEM:

E.  
Martin  
Estrada  
United  
States  
Attorney  
Mack E.  
Jenkins  
Assistant United States Attorney Chief,  
Criminal Division Rane A. Katzenstein  
Assistant United States Attorney Chief,  
Criminal Division Valerie Makarewicz  
Assistant United States Attorney Major  
Frauds Section 1100 United States  
Courthouse  
312  
North  
Spring  
Street  
Los  
Angeles,  
CA  
90012  
Telephone: (213) 894-0756 Facsimile:  
(213) 894-6269 E-mail:  
[Valerie.Makarewicz@usdoj.gov](mailto:Valerie.Makarewicz@usdoj.gov)

Amanda Liskamm  
Director, Consumer Protection Branch  
Manu J. Sebastian  
Trial Attorneys  
Consumer Protection Branch  
U.S. Department of Justice  
450 Fifth Street NW, Suite 6400 Washington, DC 20001  
Telephone: (202) 514-0515 Facsimile:  
(202) 514-8742 E-mail:  
[Manu.J.Sebastian@usdoj.gov](mailto:Manu.J.Sebastian@usdoj.gov)  
[Brianna.M.Gardner@usdoj.gov](mailto:Brianna.M.Gardner@usdoj.gov)

*/S/ Stephen R. Cochell*  
Stephen R. Cochell

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28